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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,) NO. CR 17-00583 RS
17 Plaintiff,)
18 v.) STIPULATION AND [PROPOSED] ORDER
19 DANIEL SHIREY,) RESETTING CHANGE OF PLEA
20 Defendant.)
21 _____)

22 **STIPULATION**

23 IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

24 1. The parties appeared before the Court on March 27, 2018 at 2:30 p.m. for a status
25 conference. Defendant Daniel Shirey, represented by Kenneth Wine, was present and in custody.
26 Assistant United States Attorney Karen Kreuzkamp appeared for the Government. The parties asked the
27 Court to set the case for a change of plea on April 17, 2018 at 2:30 p.m.

28 2. The parties have been and continue to work towards resolution, but do not believe they
29 will be in a position to move forward with a change of plea on April 17. The parties respectfully request
30 that the Court allow the parties one more week to resolve the case and ask that the Court vacate the April
31 17, 2018 hearing and reset the matter for a change of plea on April 24, 2018 at 2:30 p.m.

1 IT IS SO STIPULATED.

2 DATED: April 12, 2018

ALEX G. TSE
Acting United States Attorney

4 _____/s/
5 KAREN KREUZKAMP
6 Assistant United States Attorney

7 DATED: April 12, 2018

8 _____/s/
9 KENNETH WINE
10 Counsel for Defendant
11 Daniel Shirey

12

13 **[PROPOSED] ORDER**

14 Based upon the representation of counsel, the Court vacates the April 17, 2018 change of plea
15 hearing and resets the hearing for April 24, 2018 at 2:30 p.m.

16 IT IS SO ORDERED.

17

18 DATED: 4/12/18

19

20 
HON. RICHARD SEEBOULD
United States District Judge